

ALFRED R. FUENTE, PLLC
Attorney at Law
30 Wall Street, 8th Floor
New York, New York 10005
(646) 884-2669

Via Electronic Mail to MC@BarducciLaw.com

February 10, 2025

Maria-Costanza Barducci, Esq.
Barducci Law Firm, PLLC
5 West 19th Street, 10th Floor
New York, N.Y. 10011

RE: Motion to Dismiss
Nettles v. Chatpavit & Sujin LLC and Tea Cup Cafe, Inc.
Case No. 1:24-cv-06588, E.D.N.Y.

Dear Ms. Barducci,

This firm represents Defendant Chatpavit & Sujin LLC (“Defendant”) in the above-captioned matter. Pursuant to Paragraph 3(D) of the [Individual Practice and Rules of Hon. Pamela K. Chen, dated October 29, 2024](#), enclosed herewith is [Defendant’s Notice of Motion](#), together with the accompanying [Memorandum of Law in Support of Defendant’s Motion to Dismiss](#), the Declarations of [Jeffrey Kahan](#), [Jeannie Rujikarn](#), and [Alfred R. Fuente, Esq.](#), and the exhibits annexed thereto.

In accordance with the annexed Notice of Motion, Defendant shall move the Court, before the Hon. Pamela K. Chen, at the United States Courthouse located at 225 Cadman Plaza East, Courtroom 4F, Brooklyn, New York, on March 4, 2025, at 9:30 a.m., or as soon thereafter as counsel may be heard, for an Order dismissing Plaintiff GEMANE NETTLES’ (“Plaintiff”) Complaint on the grounds that:

- (i) the Court lacks subject matter jurisdiction because Plaintiff does not have standing to sue;
- (ii) Plaintiff’s Complaint is facially deficient and failed to state a claim upon which relief may be granted pursuant to Federal Rule of Civil Procedure (“Rule”) 12(b)(6), and;
- (iii) Plaintiff failed to serve the Summons and Complaint upon Defendant in compliance with the timeliness requirements of Rule 4(m).

ALFRED R. FUENTE, PLLC

If you are unable to access the hyperlinks in this letter, do not hesitate to contact me and I will send the documents to you as separate attachments.

Sincerely,

ALFRED R. FUENTE, PLLC

BY:

A handwritten signature in black ink, appearing to read "Alfred R. Fuente", written over a horizontal line.

Alfred R. Fuente

Attorneys for Defendant

CHATPAVIT & SUJIN LLC

30 Wall Street, Floor 8

New York, New York 10005

(646) 884-2669

alfred@fuentelaw.com